



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

**BY ECF AND E-MAIL**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

February 12, 2021

**MEMO ENDORSED**

RE: Our Wicked Lady, LLC, et al. v. Cuomo, et al., No. 21-cv-165

Dear Judge Cote:

This Office represents defendants Andrew M. Cuomo, in his official capacity as Governor of the State of New York, and the State of New York (the “State Defendants”).

We write jointly with plaintiffs and with co-defendants Bill de Blasio, in his official capacity as Mayor of the City of New York, and the City of New York (the “City Defendants”, and collectively with State Defendants and plaintiffs, the “Parties”) to request additional time to submit the joint stipulation of undisputed facts directed by the Court’s Order of February 10, 2021 (ECF no. 19).

The Parties are currently jointly working towards agreement on a stipulation of undisputed facts. However, given the complexities posed by the presence of multiple sets of defendants (both the State Defendants and the City Defendants), and the need to obtain client approval on multiple proposed drafts, the Parties do not expect to have the stipulation finalized by the current deadline.

As such, the Parties jointly request that the deadline to file the joint stipulation of undisputed facts be extended from today, Friday, February 12, 2021 to Wednesday, February 17, 2021. The defendants’ oppositions to plaintiffs’ motion for a preliminary injunction would remain due on Tuesday, February 23, 2021. Counsel for all Parties have conferred and join in this request.

The Parties appreciate the Court’s attention to this matter.

Granted. The joint stipulation of undisputed facts is due on February 17, 2021.  
2.12.2021

Respectfully submitted,

/s/ Matthew L. Conrad  
Matthew L. Conrad  
Assistant Attorney General  
28 Liberty Street

  
DENISE COTE  
United States District Judge

Honorable Denise L. Cote  
February 12, 2021

Page 2 of 2

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cc: Counsel of record